

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**UNITED STATES
OF AMERICA**

PLAINTIFF,

V.

MI JUNG COOK

DEFENDANT

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NO. EP:20-CR-2061-DB

JOINT MOTION FOR TRANSFER

TO THE HONORABLE DAVID BRIONES, SENIOR UNITED STATES DISTRICT JUDGE FOR THE WESTERN DISTRICT OF TEXAS:

Comes now the Defendant MI JUNG COOK, by and through her attorney of record, Richard D. Esper, and moves this Honorable Court to transfer this case to the court of United States District Judge Frank Montalvo. In support of the motion, Ms. Cook would respectfully show the Court as follows:

I.

On or about September 23, 2020, the Defendant was arrested, based on a warrant issued by a grand jury indictment, charging her with possession with intent to distribute cocaine and conspiracy to do the same, allegedly occurring in early 2018.

II.

The undersigned attorney has conducted negotiations on behalf of Ms. Cook to admit her into the program styled ADELANTE. ADELANTE is a predisposition program for certain qualified individuals that is an alternative to the traditional sentencing disposition of federal criminal cases. In order to proceed into the

program, Ms. Cook's case must be transferred to the District Court of Judge Frank Montalvo.

III.

Ms. Cooks' acceptance into ADELANTE was contingent upon approval from the Offices of the United States Attorney and United States Pretrial Services. Both offices have now given their respective approval. Assistant United States Attorney Vanessa Brown joins in the instant motion.

Wherefore, premises considered, Ms. MI JUNG COOK respectfully prays this Honorable Court transfer the instant case to United States District Judge Frank Montalvo's Docket.

Respectfully Submitted,

/s/

RICHARD D. ESPER
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of April, 2021, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system which will send notification of such filing to the following: AUSA, Vanessa Brown, Office of the U.S. Attorney, 700 E. San Antonio, Suite 200, El Paso, TX 79901.

/s/

RICHARD D. ESPER

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O R D E R

On this date came on to be considered the Joint Motion for Transfer, and the Court having considered the premises, is of the opinion that the same should be and is hereby GRANTED.

It is therefore ORDERED that the instant case is transferred to the Court of United States District Judge Frank Montalvo.

SO ORDERED on this the _____ day of April, 2021.

Accepted:

FRANK MONTALVO
United States District Judge

DAVID BRIONES
Senior United States District Judge